

JEAN E. WILLIAMS
Deputy Assistant Attorney General
United States Department of Justice
Environment and Natural Resources Division

LUTHER L. HAJEK
Natural Resources Section
999 18th St., South Terrace – Suite 370
Denver, Colorado 80202
303-844-1376 || 303-844-1350 (fax)
Luke.Hajek@usdoj.gov

Counsel for Federal Defendants

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
GREAT FALLS DIVISION**

MONTANA WILDLIFE FEDERATION,) CV 18-69-GF-BMM
et al.)
Plaintiffs,) **DEFENDANTS' UNOPPOSED**
v.) **MOTION TO CONTINUE THE**
DAVID BERNHARDT, Secretary of the) **MARCH 3, 2020 SUMMARY**
Interior,) **JUDGMENT HEARING**
et al.)
Federal Defendants,)
and)
THE STATE OF WYOMING *et al.*)
Defendant-Intervenors)

)

Pursuant to Fed. R. Civ. P. 6(b) and D. Mont. Local Civil Rule 7.1, Federal Defendants David Bernhardt *et al.* hereby move to continue the summary judgment hearing currently scheduled on March 3, 2020. *See* ECF No. 111. Defendants' counsel Luther L. Hajek was recently assigned to this case following the departure of John S. Most from the U.S. Department of Justice. *See* ECF No. 116. Mr. Hajek is unavailable during the week of March 2-6, 2020 due to previously scheduled leave. Therefore, Defendants request that the hearing be continued. Defendants' counsel has contacted the attorneys for the Plaintiffs and Defendant-Intervenors, and none of the parties oppose this request.

In order to assist the Court in rescheduling the hearing, Defendants' counsel has contacted counsel for the parties to determine dates on which they are available for a summary judgment hearing. All counsel are available on the following dates: April 9, 14-17, and 20-23, 2020. If those dates are unavailable, the parties can confer on potential other hearing dates.

Accordingly, Defendants respectfully request that the March 3, 2020 summary judgment hearing be continued to a date that is convenient for the Court.

Respectfully submitted this 6th day of January, 2020.

JEAN E. WILLIAMS
Deputy Assistant Attorney General
U.S. Department of Justice
Environment and Natural Resources Division

/s/ Luther L. Hajek

LUTHER L. HAJEK, Trial Attorney
Natural Resources Section
999 18th St., South Terrace – Suite 370
Denver, Colorado 80202
303-844-1376 || 303-844-1350 (fax)
Luke.Hajek@usdoj.gov

Counsel for Federal Defendants

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing is being filed with the Clerk of the Court using the CM/ECF system, thereby serving it on all parties of record on January 6, 2020.

/s/ Luther L. Hajek
LUTHER L. HAJEK
Counsel for Federal Defendants